

PRIVACY NOTICE

Processing related to communication through the property sales engine

I. INTRODUCTION

The purpose of this specific privacy notice (hereinafter referred to as the “**Notice**”) is to provide data subjects with transparent and clear information about the processing of their data by the Controller in relation to the request for an offer through the property sales engine in accordance with the provisions of the General Data Protection Regulation 2016/679/EU (hereinafter referred to as the “**GDPR**”).

Please note that this Notice only provides detailed information on the specific circumstances of the processing related to the request for an offer through the property sales engine.

Processing not regulated in this Notice shall be governed by the provisions of the *General Privacy Notice* and the specific and special privacy notices related to each service or activity which are available on the Controller's website (www.living.hu), and also at the Controller's registered office and shops.

II. CONTROLLER

a) (Joint) controllers within the LIVING Group:

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- 1) LIVING I Property Development Investment Fund (*registered office: H-1095 Budapest, Máriássy utca 7., Hungary*);
- 2) LIVING II. Property Development Investment Fund (*registered office: H-1095 Budapest, Máriássy utca 7., Hungary*);
- 3) LIVING III. Property Development Investment Fund (*registered office: H-1095 Budapest, Máriássy utca 7., Hungary*);
- 4) LIVING IV. Property Development Investment Fund (*registered office: H-1095 Budapest, Máriássy utca 7., Hungary*);
- 5) PW3 Ingatlanfejlesztő Korlátolt Felelősségű Társaság (*registered office: H-1095 Budapest, Máriássy utca 7., Hungary*);
- 6) LIVING-Szabolcs Kft. (*registered office: H-1095 Budapest, Máriássy utca 7., Hungary*);
- 7) ParkWest 2 Kft. (*registered office: H-1095 Budapest, Máriássy utca 7., Hungary*);
- 8) V45 Kft. (*registered office: H-1095 Budapest, Máriássy utca 7., Hungary*);
- 9) **LIVING-Service Kft.** (*registered office: H-1095 Budapest, Máriássy utca 7., Hungary*);

controller appointed as contact (gdpr@living.hu):

hereinafter jointly referred to as: **LIVING, Joint Controllers or Controller.**

Detailed information about the LIVING Group, including in particular the names of the participating controllers, the legal relationship between the joint controllers, processing related to the Group etc., is available in the *General Privacy Notice* available on the website of the Controller (www.living.hu)

b) Description of the legal relationship between the joint controllers within the Group, and the essential elements of the agreement among them:

The entity appointed by the Joint Controllers as the contact point for data subjects: **LIVING-Service Kft.** (registered office: H-1095 Budapest, Máriássy utca 7., Hungary)

Website:		www.living.hu
Contacts:	e-mail:	info@living.hu
	phone:	+36-1/808-0888
Contact details of the data protection expert:		gdpr@living.hu

Responsibility for the obligations arising from the processing is as follows. LIVING-Service Kft. as contact appointed for the data subjects, is responsible for the obligations arising from compliance with the data protection laws. Data subjects may exercise their rights in relation to the processing of their personal data by sending a request or complaint to LIVING-Service Kft. (by post to H-1095 Budapest, Máriássy utca 7., Hungary or by e-mail to: gdpr@living.hu).

Should data subjects wish to withdraw or modify (limit) their consent to processing, or express their objection to the processing, by delivering a notice by post, the notice must be addressed to LIVING-Service Kft. and sent by post.

The information related to the request for an offer through the property sales engine is jointly provided by the Joint Controllers in the form of this (joint) Notice.

The above division of responsibility for the processing of personal data among the Joint Controllers is, of course, without prejudice to the right of data subjects to exercise their rights under the data protection law in relation to and against each Controller.

III. DETAILS OF PROCESSING

PURPOSE	CATEGORIES OF PROCESSED DATA	LEGAL BASIS	STORAGE PERIOD
Manage, record, respond to and follow up on requests for offers received through the property sales engine	Name, email address, phone number, text of message	Data subject's consent [GDPR Art. 6 par. 1 (a)]	30 days following the closing of inquiries received

IV. ADDITIONAL IMPORTANT INFORMATION ABOUT PROCESSING FOR THE ABOVE PURPOSES

SCOPE OF DATA SUBJECTS	Natural persons requesting an offer through the property sales engine available on the Data Controller's website
SOURCE	The source of the data processed is the data subject.
AUTHORISED ACCESS GRANTED TO	The authorised employees of the Controllers involved in the joint processing, who may process the data only to the extent strictly necessary for the performance of their tasks.

V. DATA TRANSFER, PROCESSING

PROCESSOR	SERVICES
Beyond Visual Kft. <i>(registered office: H-1111 Budapest, Bartók Béla út 28., Hungary; company registration number: 13-09-212722; tax number: 10542994-2-13)</i>	Operation of the property sales engine
Deloitte Üzletviteli és Vezetési Tanácsadó Zártkörűen Működő Részvénytársaság <i>(registered office: H-1068 Budapest, Dózsa György út 84/C, Hungary; company registration number: 01-10-044100; tax number: 11859633-2-44)</i>	IT services related to CRM system (customer relations management system)

VI. RIGHTS OF THE DATA SUBJECTS

6.1. Data subject's right of access/to information

The data subject shall have the right to obtain from the Controller information as to whether or not personal data concerning him or her are being processed, and if so, access to their personal data and the following information:

- The **purpose** of processing;
- The **categories of personal data** concerned;
- The **envisaged period** for which the personal data will be **stored**, or, if not possible, the criteria used to determine that period,
- The **recipients** or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations, in particular recipients in third countries or international organisations. Where personal data are transferred to a third country or to an international organisation, the Applicant shall have the right to be informed of the appropriate safeguards pursuant to GDPR relating to the transfer.
- Where the personal data are not collected from the Applicant, any available information as to their **source**.
- The existence of the **right** to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- The **right to lodge a complaint** with a supervisory authority,
- The existence of **automated decision-making**, including profiling, and, at least in those cases, comprehensible information about the logic applied, as well as the significance and the envisaged consequences of such processing for the Applicant.

The Controller **shall provide** the data subject with a **copy of the personal data** undergoing processing.

For any further copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

6.2. Right to rectification

The data subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her. Subject to the purpose of the processing, the data subject also has the right to have incomplete personal data completed.

6.3. Right to restriction of processing

The Controller shall, at the data subject's request, restrict processing if one of the following applies:

- The Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- The accuracy of the personal data is contested by the data subject. In such cases the restriction remains until the Controller can monitor it;
- The data subject objects to the processing. In such cases the restriction shall apply until it is verified whether the legitimate grounds of the Controller override those of the data subject.

Where processing has been restricted, such personal data may, with the exception of storage, only be processed for the following purposes or subject to the following legal basis:

- with the consent of the data subject,
- for reasons of important public interest of the European Union or of a Member State, or
- for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person.

Should restriction on processing be removed, the data subject who has obtained restriction of processing shall be informed by the Controller before the restriction of processing is lifted.

6.4. Right to erasure

The data subject shall have the right to **request** from the Controller without undue delay the erasure of personal data concerning him or her. Furthermore, the personal data of the data subject shall be deleted by the Controller without undue delay if the conditions stipulated in the GDPR exist.

Where the Controller has made the personal data public and is obligated based on the above to erase the personal data, the Controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers who are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of the personal data in question.

The **data shall not be erased** if data processing is required:

- for compliance with a legal obligation which requires processing by European Union or Member State law;
- for the establishment, exercise or defence of legal claims (e.g.: data are needed to be used as evidence in court proceedings);
- for exercising the right of freedom of expression and information;
- for archiving in the interest of the public, scientific or historical research purposes or statistical purposes, and the erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing.

6.5. Right to data portability

The data subject has the right:

- to **receive** personal data relating to him or her which he or she has made available to a Controller in a structured, widely used, machine-readable format, and
- to **transmit** those data **to another controller** without hindrance from the Controller to which the

personal data have been provided, where:

- the processing is based on consent or a contract; and
- the processing is carried out by automated means.

-to **have** the personal data **transmitted directly from one controller to another**, if such transfer is technically possible.

6.6. Rights related to automated processing

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. This right of the data subject is a legal right, so the data subject may exercise it whether he or she requested it or not.

So automated processing may only be used if:

- it is based on the data subject's explicit consent;
- it is necessary for entering into, or performance of, a contract between the data subject and the Controller; or
- it is authorised by Union or Member State law applicable to the Controller.

In the first two cases the Controller **shall implement appropriate measures** to safeguard the data subject's rights, freedoms and legitimate interests, including at least the right of the Applicant

- to express its opinion,
- to contest the decision, and
- to obtain human intervention on the part of the Controller.

In the above cases of applicability, decisions cannot be based on the special categories of personal data, save for express consent and significant public interest, and only if appropriate measures are taken to safeguard the rights, freedoms and legitimate interests of the data subject.

6.7. Right to remedy

Every data subject shall have the right to lodge a complaint with a **supervisory authority**, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement in case of a breach concerning the applicable personal data processing.

Request for remedy and complaints may be filed at the following:

Name: National Data Protection and Freedom of Information Authority

Mailing address: H-1363 Budapest, Pf. 9, Hungary

Email: ugyfelszolgalat@naih.hu

Website: www.naih.hu

In addition to the above, the data subject is entitled to file for action with the courts against the Controller where they consider that their rights under this Regulation have been infringed as a result of the processing of their personal data by the Controller or the processor acting on its behalf or under its instructions in non-compliance with the mandatory legal act of the European Union. Such cases will be given priority by the court. Regional courts have jurisdiction over the lawsuit. At the data subject's option, the lawsuit may also be brought before the regional court for the data subject's place of domicile or residence, or the Controller's registered office.

Effective from: 08 July 2025